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March 9, 2020

VIA ECF, EMAIL AND HAND DELIVERY

The Honorable Stuart M. Bernstein, U.S.B.J.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: Picard v. The Estate of Robert Shervyn Savin, and Barbara L. Savin, in her capacity as Personal Representative of the Estate of Robert Shervyn Savin, Adv. Pro. No. 10-04889; and Chaitman LLP Adversary Proceedings Listed on Exhibit A

Dear Judge Bernstein:

This firm represents Defendants The Estate of Robert Shervyn Savin, and Barbara L. Savin, in her capacity as Personal Representative of the Estate of Robert Shervyn Savin ("Savin") in the above-referenced action as well as the Defendants listed on Exhibit A.

There is a conference scheduled for March 17, 2020 at 10:00 a.m. in *Picard v. Savin*, Adv. Pro. No. 10-04889 pursuant to Rule 7056-1(a) of the Local Bankruptcy Rules for the Southern District of New York regarding the Trustee's request for leave to file a motion for summary judgment; and in the matters listed on Exhibit A regarding the Trustee's request for the Court's assistance with appointment of mediators and scheduling of mediations or, alternatively, to dispense with mandatory mediation required by Section 5.A of the Avoidance Action Procedures.

In light of the imminent public health concerns, the Centers for Disease Control having advised people to take precautions in light of the COVID-19 virus (coronavirus) outbreak, and noting Chief Judge McMahon's Standing Order implemented today (Case No. 1:20-mc-00138-CM (S.D.N.Y. March 9, 2020) (McMahon, J.)), we respectfully request that we conduct this conference telephonically as a necessary precaution so as to mitigate the exposure to any health risks.

Respectfully submitted,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

CHAITMAN LLP

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Enclosure (as stated)

cc: *(Via: ECF and Email)*

Nicholas J. Cremona, Esq. (ncremona@bakerlaw.com)